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November 10, 2023

**BY ECF**

The Honorable Rukhsanah L. Singh, U.S.M.J.  
United States District Court  
Clarkson S. Fisher Federal Building  
& U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

***Re: Janssen Products, L.P., et al. v. eVenus Pharmaceuticals Laboratories Inc., et al.***  
**Civil Action No. 1:22-02499-RMB-RLS**

Dear Judge Singh:

We, along with our co-counsel, Crowell & Moring LLP, represent defendants eVenus Pharmaceutical Laboratories Inc. (“eVenus”) and Jiangsu Hengrui Pharmaceuticals Co. Ltd. (“Hengrui”) (collectively, “Defendants”) in the above matter. We submit this joint letter on behalf of the parties to (i) provide a proposed amended scheduling order and (ii) seek an extension until November 20, 2023 to submit “any competing proposed orders that address the parties’ disputes raised in the [discovery dispute] letters” pursuant to this Court’s Order of November 1, 2023 (ECF No. 313).

The parties met and conferred and have agreed upon the following amended schedule (the last column “Parties’ Proposal”), subject to Your Honor’s approval:

Event	Pretrial Scheduling Order (3/24) (ECF No. 202)	Amended Pretrial Scheduling Order (9/27) (ECF No. 273)	Parties’ Proposal
Parties to substantially complete document production	September 29, 2023	November 8, 2023	January 8, 2024
Motions to amend the pleadings or join new parties	October 6, 2023	November 8, 2023	January 15, 2024
No disputes regarding fact discovery may be presented to the Court,	November 3, 2023		February 12, 2024

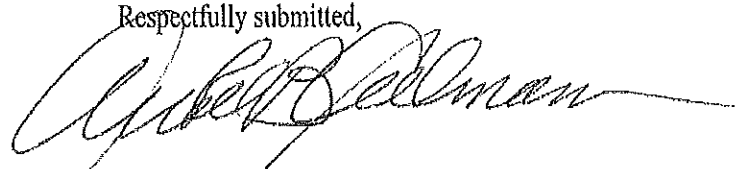
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Event	Pretrial Scheduling Order (3/24) (ECF No. 202)	Amended Pretrial Scheduling Order (9/27) (ECF No. 273)	Parties' Proposal
absent a showing of substantial good cause			
Completion of fact discovery	November 30, 2023		March 11, 2024
Opening expert reports (as to those issues for which the party bears the burden)	January 5, 2024		April 15, 2024
Responsive expert reports	February 5, 2024		May 15, 2024
Reply expert reports	March 6, 2024		June 17, 2024
Completion of expert discovery	April 5, 2024		July 17, 2024
Dispositive motions	TBD		TBD

If the proposed amended schedule meets with the Court's approval, we respectfully request that Your Honor execute the enclosed proposed order and have it entered on the docket by the Clerk of the Court.

Additionally, the parties respectfully request an extension until November 20 to submit competing proposed orders that address the parties' disputes raised in the discovery dispute letters (ECF Nos. 305, 309-10). The parties need additional time to review the transcript, prepare proposed orders, and meet and confer, if necessary. If this requested extension is acceptable to the Court, we respectfully request that Your Honor execute the provision below and have this letter entered on the docket by the Clerk of the Court.

We thank the Court for its consideration and continued assistance in this matter.

Respectfully submitted,  
  
 Arnold B. Calmann

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Enclosure  
cc: All Counsel (by CM/ECF)

**It is ORDERED** that, **by no later than November 20, 2023**, the parties shall file any competing proposed orders that address the parties' disputes raised in the letters dated October 25, 2023 (Dkt. No. 305) and October 30, 2023 (Dkt. Nos. 309-310).

SO ORDERED November 13, 2023.

  
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RUKHSANAH L SINGH  
UNITED STATES MAGISTRATE JUDGE